

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LORENA MERCEDES, ETHEL DUBOUZET, and
BARBORA SIMPSON, on behalf of themselves and
others similarly situated,

Plaintiff,

-against-

MANHATTAN FOOD & BEV LTD. d/b/a
REICHENBACH HALL, WILLIAM REICHENBACH:
aka WILLY REICHENBACH individually and KEITH:
REICHENBACH individually,

Defendant.

Civil Action No.
22-cv-02777-CM-JLC

**NOTICE OF MOTION TO
DISMISS THE COMPLAINT AND
COMPEL ARBITRATION**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Michael R. Futterman, Esq., dated June 6, 2022, together with the exhibits thereto, Affidavit of William Reichenbach, dated June 6, 2022, together with the exhibits thereto, and the Memorandum of Law in Support, Defendants Manhattan Food & Bev Ltd. d/b/a Reichenbach Hall, William Reichenbach and Keith Reichenbach (collectively, the “Defendants”) will move this Court before the Honorable Judge Colleen McMahon, United States District Court, Southern District of New York, located at 500 Pearl Street, New York, New York 10007, for an order, pursuant to Rule 12(b) of the Federal Rules of Civil Procedure and 9 U.S.C. Sections 3 and 4 of the Federal Arbitration Act (“FAA”), dismissing the Complaint in its entirety and compelling Plaintiffs Lorena Mercedes, Ethel Dubouzet, Barbora Simpson, To Tran and Katrina Sanjongco Coyle (“Plaintiffs”) to arbitrate their claims on an individual basis, or in the alternative staying these proceedings and compelling Plaintiffs to arbitrate their claims on an individual basis, awarding Defendants their costs and attorney’s fees, and granting Defendants such other relief as this Court may deem just and proper.

Dated: June 6, 2022
New York, NY

DUANE MORRIS LLP

By: /s/ Michael R. Futterman
Michael R. Futterman, Esq.
1540 Broadway
New York, New York 10036
(212) 692-1000
mrfutterman@duanemorris.com
*Attorneys for Defendants Manhattan Food
& Bev Ltd. d/b/a Reichenbach Hall,
William Reichenbach and Keith
Reichenbach*